



**Council**  
**31 January 2018**  
**Continuing Professional Development update and guidance**

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| <b>Classification</b>                        | Public                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Purpose</b>                               | For decision                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Issue</b>                                 | The paper asks Council to agree to consult on the Continuing Professional Development (CPD) and Peer Discussion Review (PDR) Guidance following agreement of the amended CPD rules and provides an update on key aspects of the implementation of the CPD scheme.                                                                                                                                                                                                                              |
| <b>Recommendations</b>                       | <ol style="list-style-type: none"><li>1. To agree to consult on the Continuing Professional Development incorporating the Peer Discussion Review Guidance.</li><li>2. To consider the progress of the implementation of the CPD scheme.</li></ol>                                                                                                                                                                                                                                              |
| <b>Financial and resourcing implications</b> | The CPD budget is outlined in Items 7 and 9.                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Equality and diversity implications</b>   | None from this paper. The impact of the scheme is being monitored from a variety of perspectives as part of our evaluation and equality impact assessment.                                                                                                                                                                                                                                                                                                                                     |
| <b>Communications implications</b>           | Communications about the implementation of the new CPD scheme are ongoing.                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Annexes</b>                               | <ol style="list-style-type: none"><li>A. Continuing Professional Development (CPD) Guidance (Jan 2018)</li><li>B. Peer Discussion Review (PDR) Guidance (Jan 2018)</li><li>C. Illustrative modelling of numbers of osteopaths entering the three year CPD scheme and completing the CPD scheme and key dates for understanding how osteopaths are complying with the CPD scheme and opportunities to take mitigating actions</li><li>D. CPD verification and assurance summary paper</li></ol> |
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## Background

1. At its meeting on 4 February 2016, Council agreed the new CPD model and in the interim period we have been taking steps to implement the CPD scheme commencing for all osteopaths from 1 October 2018.
2. There are only three further decisions for Council to make ahead of the implementation of the CPD scheme on 1 October 2018. The first is to agree the CPD rules. The second is the agreement to consult on the draft CPD and PDR Guidance. The third decision is about publication of the final CPD and PDR Guidance prior to 1 October 2018. Aside from this, Council's role is around risk, scrutiny and assurance rather than specific decisions.
3. This paper asks Council to agree to publish the CPD draft Guidance and the PDR Guidance for consultation.
4. The paper also provides an update on the progress of the implementation of the new CPD scheme with particular reference to matters of importance identified by Council following the consideration of the risk log at its meeting in November 2017.
5. This paper aims to provide assurance to Council that the scheme is on track to begin on 1 October 2018.

## Discussion

*Guidance and resources available to osteopaths to undertake the scheme when they need it*

6. The draft Continuing Professional Development Guidance is attached at Annex A and the draft Peer Discussion Review Guidance is attached at Annex B. This guidance sets out how osteopaths may demonstrate that they have met the CPD requirements in accordance with the amended CPD rules (see Item 13). The guidance was initially consulted on as part of the main 2015 consultation. The guidance was been updated following feedback from stakeholders and draft guidance has been published on our CPD website since 2016. Further small amendments have been made in order to reflect the feedback from consultation on the draft General Osteopathic Council (Continuing Professional Development) (Amendment) Rules 2018 including:
  - Highlighting the professional obligation to keep up to date
  - Inserting additional information about the annual declaration as part of the registration renewal process
  - References clarifying the start and end dates of the new CPD cycles for osteopaths.
  - Highlighting that peers are selected by osteopaths
7. The purpose of a further consultation on the CPD and PDR Guidance, immediately prior to the commencement of the scheme, is to ensure the

documents clearly outline the scheme requirements. The consultation also enables us to comply with requirements of the CPD rules (as amended – see Item 13) which require: 'Before issuing CPD guidance, the General Council shall take such steps as are reasonably practicable to consult osteopaths and such other persons and organisations as it considers appropriate.'

8. We propose that the consultation will be published for eight weeks. During that time, we will promote the consultation through our usual channels including:
  - The osteopath magazine
  - GOsC news ebuletin and other email communications
  - Dedicated social media
  - GOsC website including CPD microsite
  - Engagement with osteopaths both face to face and in online workshops.
  - CPD Partnership Group (including key osteopathic organisations and patients)
9. We will also take steps to promote the consultation to and through our wider stakeholders.
10. The consultation timetable is outlined below:

| <b>Date</b>   | <b>Activity</b>                                                                                                             |
|---------------|-----------------------------------------------------------------------------------------------------------------------------|
| February 2018 | Consultation on CPD Guidance and PDR Guidance is published.                                                                 |
| April 2018    | Consultation concludes                                                                                                      |
| May 2018      | Council to agree the final CPD and PDR Guidelines that will be effective from 1 October 2018 along with the current scheme. |

#### *Updated risk register*

11. Following feedback from Council, the CPD project risk register has been reviewed and updated. The introduction sets out more clearly how the risk register is structured. Columns around risk owners, risk status, residual risk and risk tolerance (incorporating a narrative), and risk resolution date have been added to better place the mitigation in context. This should help Council see how the risk is being managed as we move closer to implementation, then through the implementation period when all current osteopaths will enter their first three year cycle, through to completion of their three year cycles and beyond this to business as usual.
12. The updated risk register itself is available on the members' website and a summary of the key areas of interest to Council are outlined in this paper.
13. In the period to day one readiness on 1 October 2018, all risks have been categorised as reducing or stable.

14. The main risks ahead of readiness for day one, categorised as 'medium' (there are no risks categorised as high) are:
- Amendments to the online annual registration renewal form. While these amendments are straightforward, the agreed timetable will be closely monitored to ensure the form which will be completed by osteopaths from 1 October 2019 is ready *before* the start of the new CPD scheme.
  - Legislation – at the time of writing this paper, the CPD Rules, which need to be agreed before the full three year scheme can come into force, were still awaiting approval from DH and so this risk remains as medium.
15. In the implementation period – which begins on 1 October 2018 and ends in December 2022 (by which time all osteopaths who are currently on the register should have completed their registration renewal following completion of their first three year CPD period on the new scheme) – all risks have been categorised as 'stable' or 'reducing'. There are no risks categorised as high. The key areas of risk categorised as medium (or medium to low) are:
- Osteopaths' awareness, understanding and preparedness for commencing the new CPD scheme and osteopaths undertaking the new CPD scheme.
    - We have a number of mitigating actions in place incorporated into our communications strategy to raise awareness and support understanding and preparedness for the new scheme.
    - Data about what all osteopaths are doing to comply with the CPD scheme is more challenging. We will get useful data at the point of annual registration renewals as these will provide data about how osteopaths are progressing towards completion of the CPD scheme. Further information about this is outlined in the Illustrative modelling at Annex C, Figure 1. However, as indicated in Annex C, a complete set of data about year 1 activities will only be available after all osteopaths have been in the new CPD scheme for a year. This will be December 2020. Therefore, between the beginning of the scheme and implementation, we will be reliant on other forms of data to help us evaluate the progress of osteopaths in complying with the scheme. To ensure that we have the best available data to help to inform how osteopaths are progressing towards completion of the scheme, we will continue to undertake our evaluation survey (boosted by a number of randomly selected telephone interviews) which first commenced in 2016 providing a longitudinal picture about the implementation of the scheme. The survey goes out to the population of registrants, and we take steps to encourage completion of the survey using a range of communications. Whilst the nature of the longitudinal survey is that some questions remain the same to effectively track progress over time, nevertheless, Council will be able to contribute to the specification of the evaluation data that we will collect so that it has the information it needs to scrutinise the progress of the implementation of the new CPD scheme (further detail about the scheme modelling is outlined below). In

addition to this survey, we will also be analysing our web statistics, undertaking mini surveys and monitoring enquiries to help to inform our intelligence on this issue.

- Other organisations do not link our new CPD scheme (including peer discussion review) to their provision and their CPD, and osteopaths seek support to complete the CPD scheme from organisations unprepared to provide it.
    - Mitigating actions include mechanisms such as our evaluation survey and ongoing meetings of the CPD Partnership Group involving all our key stakeholders will help us to monitor and respond to this risk throughout the implementation period. It is important for us to emphasise that all osteopaths should be able to undertake the new features of the CPD scheme by accessing the guidance and resources available on our website at <http://cpd.osteopathy.org.uk>.
16. In the 'post mandatory implementation 2022 and beyond period', all risks have been categorised as 'stable' and medium. These risks primarily relate to:
- Skills of giving and receiving constructive feedback to realise the benefits of the peer discussion review.
    - Mitigating actions are in place, including the provision of resources; however, measuring the impact of this cannot take place until the completion of the first three year cycle (November 2022) and possibly the second three year cycle (November 2025).
  - The scheme's intended benefits do not materialise because the scheme does not enhance practice in accordance with the *Osteopathic Practice Standards* or create more networks and learning communities. The scheme itself is designed to enhance practice with the *Osteopathic Practice Standards*, ensuring enhanced patient care and patient safety and reducing professional isolation. However, mechanisms to measure the impact of this will not come to fruition until the completion of the first or second three year CPD cycle.
  - Recording and reflection does not deliver scheme benefits.
    - As indicated above, mitigating actions are in place through the provision of templates and example folders and other communications. But mechanisms to measure the impact of this will not come to fruition until the completion of the first or second three year cycle.
17. Further detail about these areas and other areas for which Council has requested an update are outlined below.

*Proposed changes to annual registration renewal process to provide assurance about implementation and a longer term time line to illustrate implementation*

18. The *Illustrative modelling of the osteopaths entering the three year CPD scheme* is attached at Annex C. We can see from the modelling that osteopaths enter the new CPD cycle at different points between October 2018 and October 2019

but at any one time, a number of osteopaths will be at different stages of the CPD cycle and will need different pieces of information, tailored to them, which we have illustrated below.

19. Prior to entering the new CPD scheme, osteopaths will need to know:
  - When they start their first new three year CPD period
  - What they need to submit (and when) in year 1, year 2 and year 3
  - What CPD they need to do and when (including where to go for advice and support)
  - How to reflect on and record their CPD
  - How to identify a peer
  - How to undertake a peer discussion review.
20. Information about the steps we are taking to inform osteopaths about these aspects is summarised below.

*When osteopaths start their first three year CPD period*

21. A table explaining osteopaths' start dates (for those on the Register at 1 October 2018 and those initially registered on or after 1 October 2018) is outlined in Table 1 of the Illustrative Modelling at Annex C.
22. Our communications strategy includes an individual notification to each osteopath explaining when they will enter their first CPD cycle signposting the CPD guidelines, advice and resources available on the CPD microsite and also sources of advice about the CPD scheme.

*What osteopaths need to submit at year 1, year 2 and year 3*

23. A position paper explaining the process of submissions in years 1, 2 and 3 is attached at Annex D.
24. Currently most osteopaths will renew their annual registration online.
25. We are working closely with our IT provider NetXtra to amend the renewal of registration form and IT system so that the new registration form will be available by summer 2018. A project plan is in place and monitored by the SMT Task Group.

*What CPD osteopaths need to do and when*

26. Draft CPD Guidelines and Peer Discussion Review Guidelines explaining how to complete the CPD scheme, how to complete the Peer Discussion Review and the template to be completed by the osteopath and their peer before the end of year 3 have been available on our website since 2016. As discussed above, this draft guidance will be consulted on again during the early part of 2018 to ensure clarity about the scheme and to meet the consultation requirements of the new rules.

27. The CPD microsite at <http://cpd.osteopathy.org.uk> also contains instructions about how to undertake the new features of the CPD scheme. This includes objective activities (for example patient feedback, peer observation, clinical audit, case based discussion, patient reported outcomes measures), how to record these in a way that meets the requirements of the scheme and examples from osteopaths who have already completed such activities.
28. Animations are also available on the CPD scheme explaining how it will work and how osteopaths can engage with it.
29. The CPD Guidelines provide an example of how to complete the new features of the CPD scheme during the cycle.

*How to reflect and record on their CPD*

30. There are templates and resources on the microsite to support osteopaths to reflect on CPD activities and implications for practice.
31. Example folders will be available in different formats shortly.

*How to identify a peer*

32. We intend that the year 1 campaign targeted at osteopaths entering the first year of the new CPD scheme will encourage them to identify their peer early.
33. The peer discussion review guidelines provide advice about selection of a peer. It states: 'The peer discussion review is a structured formal discussion with a peer, selected by the osteopath, under the auspices of a local group, educational institution, clinical interest group, member of the Osteopathic Alliance, another osteopath or health professional, or with the GOsC.'
34. We have been working closely with other organisations through our CPD Partnership group and also undertaking 'peer discussion review' workshops with osteopaths to raise awareness of the peer discussion review process, help osteopaths consider how they might select a peer suitable for them, and to try out a peer review activity.
35. As the cycle moves forward, we intend that these workshops will be rolled out to key organisations to maintain momentum about peers and to share positive experiences of liaising with peers throughout the CPD cycle.

*How to prepare for and undertake a peer discussion review*

36. We have one example of a group peer discussion review available on our website. We are also running a series of mock peer discussion review workshops during 2018 and 2019 with a view to generating further examples to help osteopaths understand how to undertake a peer discussion review before the first three year CPD cycles come to an end on 30 September 2021.

### *Annual registration renewal requirements*

37. The CPD verification and assurance summary paper at Annex D outlines the requirements for submitting information about CPD at the end of year 1, year 2 and year 3 of the CPD cycle. This has also been clarified in further detail in the draft CPD Guidelines following the CPD Rules consultation.
38. In summary, osteopaths will no longer submit the same level of detail about their CPD to the GOsC annually (that is, we are removing the requirement to submit a CPD Annual Summary Form), but osteopaths will self-declare:
- The number of hours of CPD undertaken
  - The number of hours which are in the category 'learning with others'
  - Whether any activities have been undertaken against the four themes of the *Osteopathic Practice Standards*
  - Whether an objective learning activity has been completed
  - Whether a communication and consent activity has been completed
  - Whether they have identified their peer
  - Whether the peer discussion review has been completed.

### *Understanding progress made with undertaking the new features of the CPD scheme*

39. Table 2 in the Illustrative Modelling at Annex C explains key data points and the implications for GOsC in terms of understanding how osteopaths are progressing with compliance with the scheme. We will have the first submissions of annual registration declarations, from those osteopaths who have entered the new scheme, between October 2019 and December 2019 (less any late submitters) and the first complete data set for year 1 for all osteopaths registered on 1 October 2018, will be available from December 2020. These data will help us to understand whether most osteopaths are on track at year 1, what aspects of the new scheme have been completed at this stage, how many osteopaths have identified their peer and will help us to adapt our communications accordingly. This data will also inform the ongoing review of our risk log.
40. As there is a gap until we get a first complete registration renewal data set, we will continue targeted review through our longitudinal annual CPD evaluation tracking survey (the CPD Evaluation) and other listening mechanisms, for example feedback from stakeholders, enquiries etc which will help us to understand how osteopaths are progressing with completing the new CPD scheme and help us to continue to target communications. In May and October 2020 the registration renewal data for most osteopaths will give us a good sense of whether we are on track to support osteopaths to complete the new CPD scheme. Again, communications will be targeted accordingly.
41. The CPD Evaluation provides both a baseline to understand how the implementation of the CPD scheme affects patterns of CPD over time as well as providing a tool which enables osteopaths to reflect on their own CPD. Unlike the registration renewal data, completion of the survey is voluntary and therefore, it is not as generalisable as the registration renewal data. But it is still



a credible data source to help us to understand the progress of the implementation of the CPD scheme before registration renewal data is available.

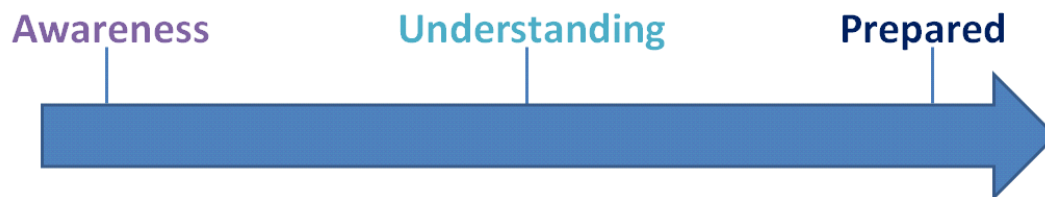
42. In June 2016, the Policy Advisory Committee (PAC) reviewed the previously agreed scope for the CPD Evaluation which included a review of the data already held on CPD to answer the research questions. Further information about the scope of the CPD Evaluation is available at <http://www.osteopathy.org.uk/news-and-resources/document-library/about-the-gosc/pac-june-2016-item-10-cpd-scheme-development/?preview=true>. In October 2016, the PAC reviewed the findings from the review of the CPD data already held and the draft CPD Evaluation Survey before the survey was launched from November to January 2017. This paper is available at: <http://www.osteopathy.org.uk/news-and-resources/document-library/about-the-gosc/pac-october-2016-item-4-continuing-professional-development/?preview=true>.
43. In March 2017, the PAC considered the findings from the first baseline CPD Evaluation survey providing a picture of patterns of CPD prior to the implementation of the CPD scheme. This paper is available at: <http://www.osteopathy.org.uk/news-and-resources/document-library/about-the-gosc/pac-march-2017-item-3-continuing-professional-development-cpd/?preview=true>. The Committee noted that the aim of the 'State of CPD' evaluation report was to provide a baseline against which the implementation of our CPD scheme can be measured. The Policy Advisory Committee noted the evaluation framework previously agreed by the Education and Registration Standards Committee in March 2015. They also noted key findings from the baseline which included:
- High numbers of osteopaths are not undertaking feedback on their practice from external sources at present (the objective activity element of the CPD scheme should influence this finding over time).
  - More than half of osteopaths responding to the survey undertook CPD in the area of communication and consent. (The communication and consent element of the CPD scheme should influence this finding over time).
  - In terms of planning CPD and identifying learning needs, the survey identifies that there is high confidence in the ability to reflect on CPD, although some challenges are identified and particularly, recording CPD was reported as a challenge (as the scheme rolls out and further templates to support reflection and recording are used, we hope that this finding will be enhanced over time).
  - A high percentage of osteopaths report having a peer with whom they can discuss a case.
44. In June 2017, the PAC received a presentation about the implementation of the CPD scheme. The Committee noted that the 'evaluation of the scheme would continue throughout its implementation to measure changes against the baseline of osteopaths complying with CPD standards.' A copy of the presentation is available from Fiona Browne at [fbrowne@osteopathy.org.uk](mailto:fbrowne@osteopathy.org.uk).

45. An update was presented to Council in November 2017. This paper is available at: <http://www.osteopathy.org.uk/news-and-resources/document-library/about-the-gosc/council-november-2017-item-12-cpd-implementation-scheme-update/?preview=true>. This paper explained some small changes that had been made to the CPD Evaluation Survey by staff with expertise in survey design. The draft survey had been tested with staff prior to launch on 1 November 2017. This year's CPD Evaluation Survey closed on 21 January 2018. As at 16 January 2018, we had received 407 responses (compared to 356 responses received last year). The findings are due to be reported to the PAC in March 2018.

### Communications and Engagement Strategy

46. Our updated communications and engagement strategy for the new CPD scheme aims to inform osteopaths about the requirements of the scheme and to give them the confidence and resources they need to meet its requirements. It builds on the communications work that has already been done, including creating a network of Early Adopters, awareness raising across GOsC channels, creation of a dedicated CPD microsite and the production of multiple resources.
47. The strategy has three strands:
- **Reassurance:** about the scale of the changes and the size of the task in hand.
  - **Support:** we are providing guidance and resources to help osteopaths and they will be giving and getting support from each other.
  - **Responsive and Listening:** we are engaging and listening to the concerns and/or information needs of osteopaths and we will respond by developing messages, advice and resources to meet those needs.
48. The strategy has three main aims. Firstly: To raise awareness among osteopaths about the new requirements. We will continue to do this via regular promotion and content through all our social media, print and digital channels; Face2Face events; utilising influential/highly engaged osteopaths: leaders, regional groups, early adopters; utilising stakeholder channels; direct and strategic targeting of isolated single practitioners to reach the 'harder to engage/reach' groups.
49. Secondly: To increase understanding of the requirements. To achieve this we will continue to produce guidance and advice in a variety of formats including in-depth features in The Osteopath magazine; running online workshops; identifying needs and producing resources to meet those needs and monitoring levels of understanding and adjusting accordingly.
50. Thirdly: To help prepare osteopaths. We will do this specifically by engaging to discover where there is uncertainty or unpreparedness, and providing resources to ameliorate. We will examine feedback from events, surveys, plus anecdotal concerns to continually identify and respond to information and communication needs.

51. We are aware that registrants are at different stages in relation to the scheme:



Therefore we will continue to raise awareness and explain the requirements of the new scheme as well as producing in depth information for those further along the line.

52. Our strategic approach makes significant use of insight. To be responsive to needs we need to continually seek and analyse feedback and learn more about our target audience through regular surveys and questionnaires, feedback from events, visits by the comms team and other staff out to regional groups, analysis of requests made to GOsC directly by osteopaths plus anecdotal concerns so that we can continually identify and respond to information and communication needs.

53. The tactics we will utilise include:

- Regularly driving stakeholders and osteopaths to <http://cpd.osteopathy.org.uk>
- Producing and promoting relevant new and existing resources
- Encouraging engaged osteopaths to share their experiences through blogs, quotes, videos
- Reviewing, enhancing and updating, as appropriate, existing resources, for example, through using content from Early Adopters
- Targeting isolated osteopaths
- Updating and publishing learning resources for final Peer Discussion
- Utilising influential/highly engaged osteopaths: leaders, regional groups, early adopters to become our 'CPD scheme champions'

54. Since the last Council meeting on 2 November 2017, we have:

- Commissioned our second animation 'Introducing the CPD scheme' explaining in under 2 minutes how to undertake the new GOsC CPD scheme. The animation will be available, in due course, at: <http://cpd.osteopathy.org.uk/>
- Run 12 webinars (including case based discussion, Patient Reported Outcome Measures (PROMs) in partnership with the National Council for Osteopathic Research (NCOR), patient feedback, clinical audit in partnership with NCOR) supporting osteopaths to undertake the objective activity aspects of the new CPD scheme to increase confidence and to generate and publish examples of how to complete objective activities for others.

- We have also held 'follow up' webinars for those who have completed programmes with us. These have focussed on establishing groups to continue to meet to facilitate their own sessions rather than being facilitated by GOsC staff. When osteopaths run their own sessions they can utilise and test out the materials we designed to support osteopaths who are developing their own communities.
- Held two meetings of the SMT Task Group to oversee the implementation of project work streams along with supporting meetings about the development of particular work streams including process, audit (now verification and assurance) and IT.
- Presented our approach to process, verification and assurance and IT to the continuing fitness to practise inter-regulatory group meeting, in November 2017, to seek feedback on our approach to mitigation of risk.
- Held one CPD Partnership Board (on 7 November 2017) comprising stakeholders from across the osteopathic sector and patients to seek feedback on our Amendment to the CPD rules consultation, explore our communication messages, draft work book resources and other plans for development of peer discussion review.
- Concluded the consultation on the amendments to the CPD Rules and liaised with policy colleagues at DH to agree a final version of the Amendment to the CPD Rules consultation.
- Disseminated the October, November and December GOsC news ebulletins – which promoted aspects of the CPD scheme including:
  - Awareness of the CPD scheme including a one page flyer available on the CPD microsite summarising the requirements
  - Promotion of free online training for osteopaths to become familiar with the requirements of the new CPD scheme and particularly to gain confidence in the objective activities, recording and reflecting on these and building networks and communities.
  - Promoting completion of our CPD evaluation supporting osteopaths to prepare for the new CPD scheme.
- Published the December/January edition of *the Osteopath* magazine, which focused on getting ready for the new scheme (sent to all osteopaths, a number of students and a range of our stakeholders), including:
  - Focus on peer observation, one of the objective activities options in the new scheme – including promotion of the new peer observation workbook and other resources. Plus osteopath, Maria Bridger (an Early Adopter) and the Carlisle Osteopath Group shared experiences and tips about carrying out peer observation.

- Promoting online workshops, including quotes from participants about the benefits they found.
- A longer article about the CPD evaluation survey to encourage readers to fill it in, including contributions from Liz Elander and Lucy Mackay Tumber about the potential benefits of using the survey to review and plan CPD for the year ahead.
- Up to date information on CPD courses available in 2018.
- Disseminated some single topic communications emails to promote the CPD evaluation survey plus initiated email targeting of osteopaths working alone to inform them about the ways they can connect with other osteopaths.
- Ongoing social media campaign continued promoting the CPD microsite and resources, encouraging registrants to complete the CPD evaluation survey (plus promotion on the GOsC website home page). CPD content in 'The Osteopath' is also being promoted via these methods: social media, home page and website news stories.
- Undertaken a webinar on behalf of the CPD provider, osteoowl to up to 20 osteopaths offering an opportunity for questions and answers about the new CPD scheme, focussing on the communication and consent element.

*Governance process for allocation of £100k reserve*

55. The governance process for the allocation of the £100k reserves is now integrated into organisational business planning and budgeting processes and further detail around this is outlined at Items 7 and 9 on this agenda.

**Recommendations:**

1. To agree to consult on the Continuing Professional Development incorporating the Peer Discussion Review Guidance.
2. To consider the progress of the implementation of the CPD scheme.